



BRIAN J. MOLLOY, ESQ.

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April 3, 2024

**VIA ECF**

James B. Clark, U.S.M.J.  
United States District Court  
for the District of New Jersey  
50 Walnut Street, #4015  
Newark, New Jersey 07102

***Re: Abuchi Raymond Wealth v. Fox Rothschild LLP, Alka Bahal, Kristen M. Amabile,  
et al.  
Civil Action No. 2:23-cv-3194-ES-JBC***

Dear Magistrate Judge Clark:

This law firm represents Defendant Fox Rothschild LLP in the above captioned matter. Please accept this letter as a request for a telephone conference to address the failure of Plaintiff's counsel to submit any initial disclosures on behalf of either of the two Plaintiffs.

The deadline for exchanging Initial Disclosures was March 11, 2024 and the three Defendants provided their respective Initial Disclosures to Plaintiff's counsel, Tyrone Blackburn, Esq., on that date. Mr. Blackburn did not submit any Initial Disclosures on March 11, 2024.

The following day I sent an email to Mr. Blackburn reminding him of the deadline the previous day and asking when we could receive Plaintiffs' Initial Disclosures. Mr. Blackburn did not respond.

Since I did not hear from Mr. Blackburn, I sent him another email on March 19, 2024, again asking when he would submit his Initial Disclosures. Again, Mr. Blackburn did not respond.

Hearing no response, I then sent another email to Mr. Blackburn on March 26, 2024 reminding him that his Initial Disclosures were more than two weeks overdue, and asking when we could expect to receive them. A copy of my email on March 26, 2024 is attached. Again, no response from Mr. Blackburn. Attached is an email string with the three emails to Mr. Blackburn.

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I apologize for having to communicate with the Court on this issue, but I have exhausted all resources available to me to seek Mr. Blackburn's voluntary cooperation to comply with his obligation to submit Initial Disclosures on behalf of the two Plaintiffs.

It is respectfully requested that Your Honor schedule a telephone conference with all counsel to address this issue.

Thank you for your consideration of this letter.

Respectfully submitted,



BRIAN J. MOHLOY

BJM/lb

cc: Tyrone Blackburn, Esq. (*Via Efilng & Email*)  
Ronald Israel, Esq. (*Via Efilng & Email*)  
Mary Toscano, Esq. (*Via Efilng & Email*)

**Bye, Lisa**

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**From:** Molloy, Brian  
**Sent:** Tuesday, March 26, 2024 10:01 AM  
**To:** Tyrone Blackburn  
**Cc:** Israel, Ronald; Gladis, Brigitte M.; Mary Toscano; Kluska, Daniel J.  
**Subject:** FW: Wealth v. Fox Rothschild

Tyrone,

Good morning. Your Initial disclosures are now more than two weeks overdue. You have not responded to my previous emails . Can you please comply with your obligation under the federal rules.

Regards,  
Brian

**From:** Molloy, Brian  
**Sent:** Tuesday, March 19, 2024 8:50 AM  
**To:** Tyrone Blackburn <[tblackburn@tablackburnlaw.com](mailto:tblackburn@tablackburnlaw.com)>  
**Cc:** Israel, Ronald <[risrael@csglaw.com](mailto:risrael@csglaw.com)>; Gladis, Brigitte M. <[bgladis@csglaw.com](mailto:bgladis@csglaw.com)>; Mary Toscano <[mtoscano@greenbaumlaw.com](mailto:mtoscano@greenbaumlaw.com)>  
**Subject:** FW: Wealth v. Fox Rothschild

Tyrone,

Can you lease respond to me email from March 12 regarding your overdue Initial Disclosures?

Brian

**From:** Molloy, Brian  
**Sent:** Tuesday, March 12, 2024 10:42 AM  
**To:** Tyrone Blackburn <[tblackburn@tablackburnlaw.com](mailto:tblackburn@tablackburnlaw.com)>  
**Cc:** Israel, Ronald <[risrael@csglaw.com](mailto:risrael@csglaw.com)>; Gladis, Brigitte M. <[bgladis@csglaw.com](mailto:bgladis@csglaw.com)>; Mary Toscano <[mtoscano@greenbaumlaw.com](mailto:mtoscano@greenbaumlaw.com)>; Kluska, Daniel J. <[dkluska@wilentz.com](mailto:dkluska@wilentz.com)>  
**Subject:** Wealth v. Fox Rothschild

Tyrone,

Good morning. Yesterday was the deadline to serve Initial Disclosures, and all defendants did so. When can we receive plaintiffs' Initial Disclosures?

**Brian J. Molloy | Shareholder**

**WILENTZ**

—ATTORNEYS AT LAW—

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